

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

BELCALIS MARLENIS ALMANZAR,	*	
	*	
Plaintiff,	*	
	*	
v.	*	Civil Action No.
	*	1:19-cv-01301-WMR
	*	
LATASHA TRANSRINA KEBE et al.,	*	
	*	
Defendants.	*	

**DEFENDANT KEBE’S MOTION TO FILE DOCUMENTS UNDER SEAL**

COMES NOW Latasha Kebe (hereinafter referred to as “Ms. Kebe”), by and through undersigned Counsel, and, pursuant to Fed. R. Civ. P. 5.2(d) and 26(c), the parties’ Consent Protective Order (Dkt. 53), and Section II.J to Appendix H of this Court’s Local Rules, respectfully requests that this Honorable Court enter an Order permitting Ms. Kebe to file the following supporting documents under seal:

1. The following supporting documents to Kebe’s Motion to Compel Full and Complete Responses to Kebe’s First Continuing Interrogatories:
  - a. Kebe’s Brief in Support of her Motion to Compel Full and Complete Responses to Kebe’s First Continuing Interrogatories (hereinafter referred to as “Kebe’s Brief”);
  - b. Exhibit 1 to Kebe’s Brief: Kebe’s First Continuing Interrogatories;

- c. Exhibit 2 to Kebe's Brief: Plaintiff's Responses to Kebe's Interrogatories;
- d. Exhibit 3 to Kebe's Brief: Deficiency Letter addressing Plaintiff's Responses to Interrogatories, sent to Plaintiff's counsel on August 31, 2020;
- e. Exhibit 4 to Kebe's Brief: Plaintiff's Supplemental Responses to Kebe's Interrogatories;
- f. Exhibit 5 to Kebe's Brief: Discovery Dispute Letter sent to Ms. Lundy on November 30, 2020;
- g. Exhibit 6 to Kebe's Brief: Plaintiff's Discovery Deficiency Chart created on December 4, 2020;
- h. Exhibit 7 to Kebe's Brief: Email sent to Plaintiff's counsel on December 4, 2020, with the Discovery Deficiency Chart attached;
- i. Exhibit 8 to Kebe's Brief: Plaintiff's Second Supplemental Responses to Kebe's Interrogatories;
- j. Exhibit 9 to Kebe's Brief: Subpoena for Deposition, sent to Rashad Haughton on November 3, 2020; and
- k. Exhibit 10 to Kebe's Brief: Subpoena for Document Production, sent to Rashad Haughton on November 3, 2020.

2. The following supporting documents to Kebe's Motion to Compel Full and Complete Responses, and Production, to Kebe's First Requests for Production of Documents and Things:
  - a. Kebe's Brief in Support of her Motion to Compel Full and Complete Responses, and Production, to Kebe's First Requests for the Production of Documents and Things (hereinafter referred to as "Brief in Support");
  - b. Exhibit 1 to Brief in Support: Kebe's First Requests for the Production of Documents and Things;
  - c. Exhibit 2 to Brief in Support: Plaintiff's Responses to Requests for Production;
  - d. Exhibit 3 to Brief in Support: Deficiency Letter addressing Plaintiff's Responses to First Requests for Production, sent to Plaintiff's counsel on August 31, 2020;
  - e. Exhibit 4 to Brief in Support: Email sent to Plaintiff's counsel on September 17, 2020, regarding overdue production.
  - f. Exhibit 5 to Brief in Support: Plaintiff's Supplemental Responses to Requests for Production;

- g. Exhibit 6 to Brief in Support: Discovery Dispute Letter sent to Ms. Lundy on November 30, 2020;
  - h. Exhibit 7 to Brief in Support: Plaintiff's Discovery Deficiency Chart created on December 4, 2020;
  - i. Exhibit 8 to Brief in Support: Email sent to Plaintiff's counsel on December 4, 2020, with the Discovery Deficiency Chart attached;
  - j. Exhibit 9 to Brief in Support: Plaintiff's Second Supplemental Responses to Requests for Production;
  - k. Exhibit 10 to Brief in Support: Notice to Preserve Data, mailed to Facebook, Inc. on June 14, 2019;
  - l. Exhibit 11 to Brief in Support; Facebook, Inc. Reply Letter, dated June 28, 2019.
3. This Motion is supported by Defendant Kebe's Memorandum of Law, submitted contemporaneously herewith, and a Proposed Order, attached hereto.

**CERTIFICATION AS TO FONT**

In accordance with Local Rule 7.1(D), the undersigned certifies that the foregoing document was prepared with Times New Roman 14 point, a font and point selection approved by the Court in Local Rule 5.1(C).

Respectfully submitted this 21st day of December, 2020.

/s/Olga Izmaylova  
olga@silawatl.com  
Georgia State Bar No. 666858

/s/Sadeer Sabbak  
ssabbak@silawatl.com  
Georgia State Bar No. 918493

SABBAK & IZMAYLOVA, P.C.  
1875 Old Alabama Road  
Suite 760  
Roswell, Georgia 30076  
p. (404) 793-7773  
f. (678) 878-4911

*Attorneys for Latasha Kebe*

**CERTIFICATE OF SERVICE**

I hereby certify that on December 21, 2020, I electronically filed Defendant Kebe's Motion to File Documents Under Seal, Brief in Support of Motion, and a Proposed Order with the Clerk of the Court using the CM/ECF system, which will automatically send email notification of such filing to all of the attorneys of record.

/s/Olga Izmaylova  
olga@silawatl.com  
Georgia State Bar No. 666858

SABBAK & IZMAYLOVA, P.C.  
1875 Old Alabama Road  
Suite 760  
Roswell, Georgia 30076  
p. (404) 793-7773  
f. (678) 878-4911